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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	
)	Case No.: 2:09-CR-190-JCM-PAL
Plaintiff,)	
)	GOVERNMENT'S MOTION TO QUASH
vs.)	MATERIAL WITNESS AREST
)	WARRANT AND DISMISS PRETRIAL
JOEL SOLIS-AGUIRRE,)	SERVICES PETITION FOR
)	REVOCATION OF RELEASE
Defendant.)	
)	

The undersigned counsel certifies that this motion is timely filed.

COMES NOW, the United States, by and through DANIEL G. BOGDEN, United States Attorney, and Kimberly M. Frayn, Assistant United States Attorney, and moves to quash the material witness arrest warrant and dismiss Pretrial Services Petition For Revocation of Release for the following reasons:

On or about February 1, 2011, the Government sought to retain Pretrial Services' supervision over material witness Joel SOLIS-AGUIRRE. An arrest warrant had issued for JOEL SOLIS-AGUIRRE because it was alleged that he violated the conditions of his pretrial release by committed new law violations, including allegations that he has committed crimes of violence. At that time, the government believed that the witness was in custody pending trial in

1 California and asked that the Pretrial Services Petition for Revocation of Release and the
2 accompanying arrest warrant issued against Joel SOLIS-AGUIRRE remain undisturbed and
3 actively in place.

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5 However, as of the date of this filing, all the defendants in the underlying criminal
6 matter have been convicted, sentenced, and there are no pending appeals or collateral challenges
7 as to those convictions or sentences. Moreover, the United States Marshals advised undersigned
8 counsel that JOEL SOLIS-AGUIRRE has been convicted of his crimes in California. He is
9 presently serving a custodial term in Salinas Valley State Prison in California. Undersigned
10 counsel believes that ICE has a detainer lodged against JOEL SOLIS-AGUIRRE and he may
11 ultimately be deported upon his release from state custody. Accordingly, the Government
12 respectfully moves to quash material witness arrest warrant and dismiss Pretrial Services
13 Petition For Revocation of Release. Pretrial Services Officer Ronald Pease advises that he has
14 no objection to the Government's request as set forth herein.

15 Respectfully submitted,

16 DANIEL G. BOGDEN,
17 United States Attorney

18 /s/ Kimberly M. Frayn
19 KIMBERLY M FRAYN
20 Assistant United States Attorney
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PROPOSED ORDER

IT IS SO ORDERED, the material witness arrest warrant issued against JOEL SOLIS-AGUIRRE is hereby quashed and the Pretrial Services Petition For Revocation Of Release pending against JOEL SOLIS-AGUIRRE is hereby dismissed.

DATED: July 8, 2016


HONORABLE PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, Kimberly M. Frayn , certify that the following individual was served with a copy of the GOVERNMENT'S MOTION TO QUASH MATERIAL WITNESS AREST WARRANT AND DISMISS PRETRIAL SERVICES PETITION FOR REVOCATION OF RELEASE on this date by *Electronic Case Filing* and by email to Chris Rasmussen, Esq., counsel for the material witness JOEL SOLIS-AGUIRRE.

DATED: March 8, 2016.

//s// Kimberly M. Frayn
KIMBERLY M. FRAYN
Assistant United States Attorney